



4 MAR 1980

Mr. John P. McNicholas
Acting Deputy Assistant for
Information Policy
New Executive Office Building
Room 9002
Washington, DC 20503

Dear Mr. McNicholas,

Attached are Interagency Committee for ADP comments on House Resolution No. 6410.

Due to the short response time available by your office, the full Interagency Committee did not have an opportunity to respond. However, the Executive Board of IAC consisting of representatives from HEW, HUD, DOD, DOE, Congress, Treasury, and Agriculture did review HR 6410 and their coordinated comments appear below.

IAC fully supports this effort to reduce paperwork in the Federal Government. We note that the burden placed on the OMB and the agencies to execute this Bill will be great, but with proper planning and the effective use of ADP the burden will be considerably alleviated. IAC/ADP will be pleased to lend support where possible in this area.

We do have some major concerns with the sections of the Bill that deal with ADP and Telecommunications. If these concerns are accommodated then we can fully support all aspects of the Bill. IAC supports the basic tenets of these sections in having the OMB more involved in a policy and oversight role in

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regard to the effective and efficient use of ADP by Federal agencies. We believe that determined pursuit of the objectives by OMB of this Bill could aid agencies in acquiring ADP faster, reduce the obsolescence problem, and lead to better planning and more effective use of this resource by agencies. In addition, the added emphasis on control of standards and their utility in obtaining competition as well as transportability of ADP systems is again fully supported by IAC.

We have three concerns with the details in implementing the sections of the Bill dealing with ADP and Telecommunications.

The first is the basic relationships between the OMB, GSA, and the agencies. The Bill can be interpreted as placing GSA in a control, directive, and review position essentially at the OMB level in addition to their normal procurement and acquisition responsibilities. To equip GSA to perform these roles would be an additional overhead in the Federal bureaucracy that would be a redundant one and contrary to the President's policy to reduce overhead in the Federal bureaucracy. More important, if our interpretation holds, is that conflict will arise between the agencies who have the ultimate responsibility for execution of programs and GSA which interfaces in one segment of the process. On occasion, conflict will exist between an agency's mission responsibility and GSA's procurement responsibility. The need is to establish a smooth supportive management flow from the definition of need, through the requirement determination, acquisition, implementation, and operation. OMB is properly placed to insure that flow and presently has the authority by the Brooks Bill to adjudicate differences between agencies and the GSA to ultimately decide the best course of action the Government should take. OMB, therefore, should remain separate, independent and above the agencies and GSA to properly execute its adjudication role. We recognize that OMB has not been active in this regard in the past, but House Resolution 6410 clearly directs and emphasizes execution by OMB. Specifically, GSA should not be a party to the responsibility to develop 5-year plans for the Government. This is clearly the agency's responsibility. GSA should, however, be the recipient of the agency plans and provide by requirements contracts or other means the capabilities to assist the agencies in execution of their plans. Further, GSA should not directly influence the budget process which is again properly constituted as an agency and OMB responsibility. OMB can and should receive input from GSA on agency actions pertaining to ADP and Telecommunications which may at OMB discretion influence the budget process.

Our second concern is with the possible interpretation of the review function detailed in House Resolution 6410. It may be construed that OMB will direct internal auditors and may use one agencies auditors to investigate another agency. Agency internal auditors and inspector generals are more independent than ever in our history and perform a needed function for senior management of an agency to investigate internal problems and take corrective action. The agency staff is much more familiar with potential internal problems, and agencies currently have the capability to investigate and correct problems before they get out of hand, do serious damage, or bring discredit to the Federal government. Direct control of internal audit functions by central agencies will take away or at a minimum dilute the capability of agency heads to correct their own problems.

Our third concern deals with the senior official responsible for execution of this Bill at the agency level. We agree with insuring that a senior official be designated at a high level to be responsible to assure the tenets of this Bill are executed, but disagree with the legal requirement for that same individual to necessarily be responsible for the acquisition and control of ADP and Telecommunications. This should be at the agencies discretion. Most organizations vest procurement authority in procurement and acquisition experts. To force the same individual to be responsible for all the myriad aspects of this Bill to include acquisition of ADP resources may disturb an effective management relationship within agencies that exists today.

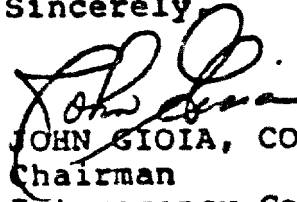
We believe the intent of the Bill as it pertains to ADP and Telecommunications; to have OMB responsible for policy pertaining to the requirement, acquisition, and use of the information technology resource and to be an active and forceful player in this regard is worthy. We also believe the Bill's intention for GSA to have a direct role in support of OMB's responsibility to be proper.

However, the specific wording of the Bill leads to different interpretations which is the cause of our concern. Proper rewording will correct these areas of concerns. Specific suggestions are attached.

The Interagency Committee on ADP appreciates the opportunity to be a participant and hopefully has provided constructive advice in supporting the desire of the Congress to

relieve the paperwork burden on the American public and to more effectively and efficiently use the vast ADP resource of the Federal Government.

Sincerely,



JOHN GIOIA, COLONEL, USAF
Chairman
Interagency Committee on
Automatic Data Processing
(IAC/ADP)

1 Attachment
Recommended Changes